Corporate Compliance Report

Audit & Compliance Committee of the Board of Directors

March 15, 2019

COOK COUNTY
HEALTH

Meeting Objectives

Review

Background & Metrics

- Organizational Chart
- Year-Over-Year Comparison
- Metrics
  - Cook County Health as a Provider of Health Care Services
    - Provider Annual Report
  - CountyCare Medicaid Health Plan
    - CountyCare Annual Report

Action

- Annual Education (4-Required Modules)

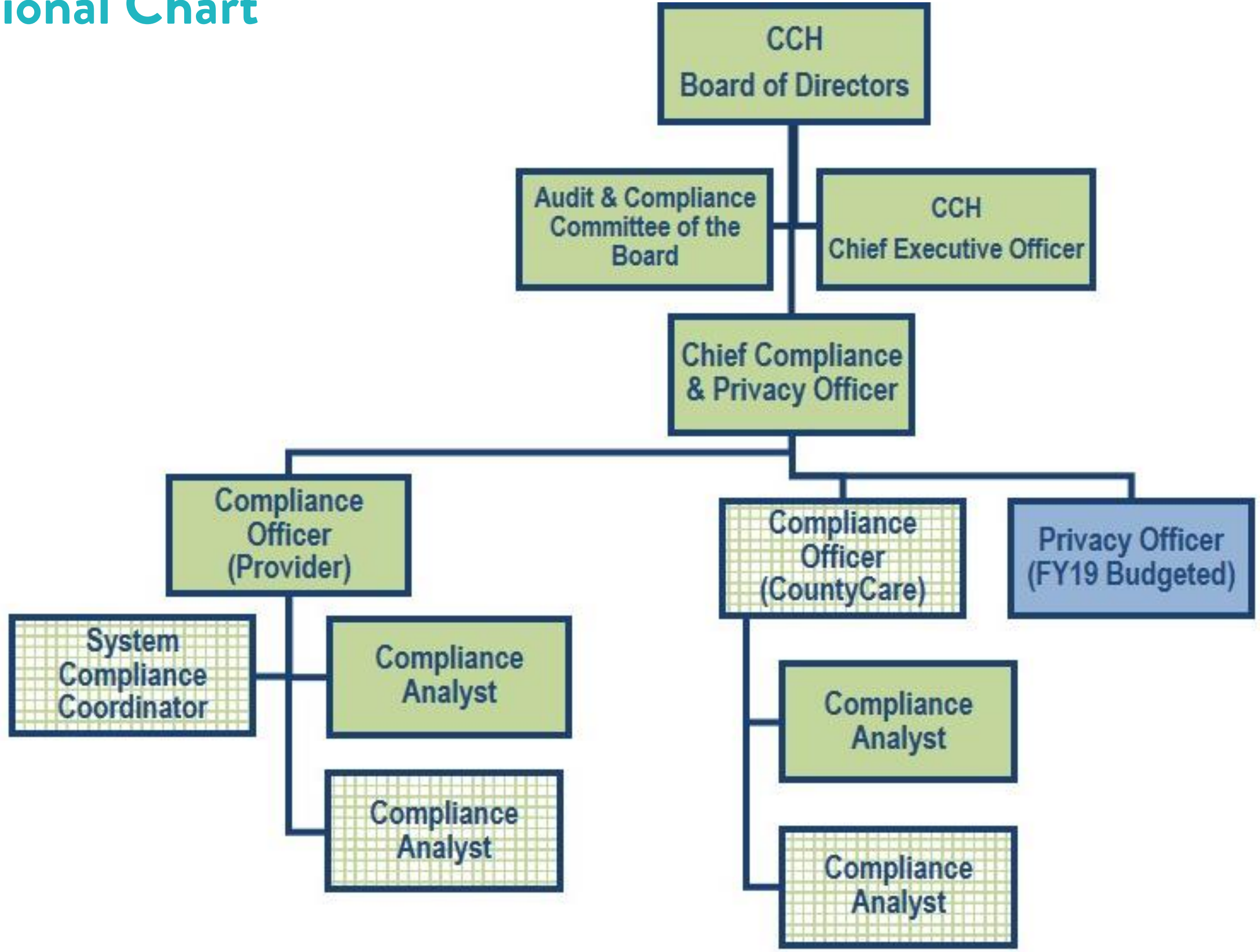
Corporate Compliance

Background

COOK COUNTY
HEALTH

CCH Corporate Compliance Staffing

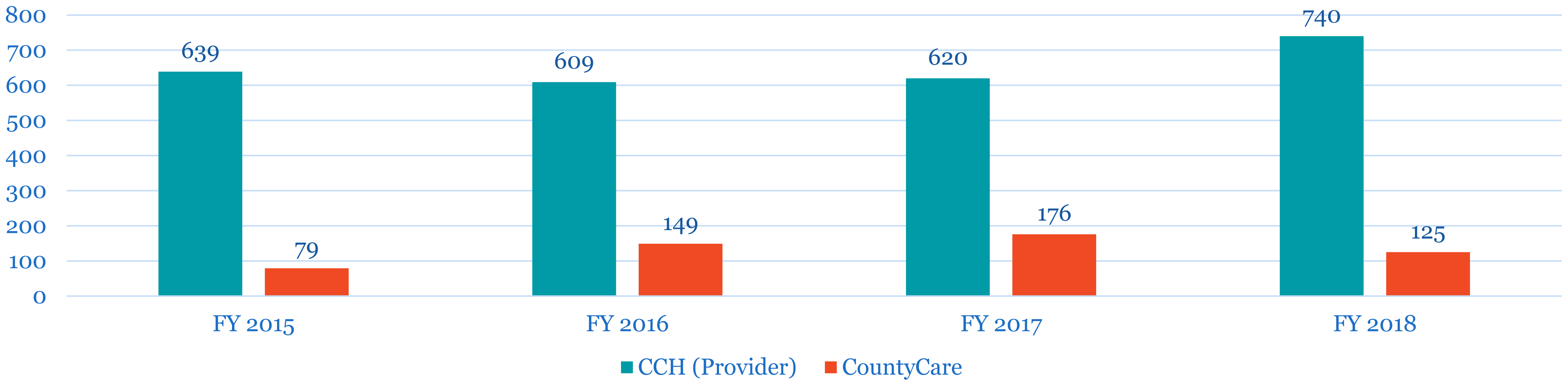
2018 Organizational Chart


CCH Board of Directors
Audit & Compliance Committee of the Board
CCH Chief Executive Officer
Chief Compliance & Privacy Officer
Compliance Officer (Provider)
Compliance Officer (CountyCare)
Privacy Officer (FY19 Budgeted)
System Compliance Coordinator
Compliance Analyst
Compliance Analyst
Compliance Analyst
Compliance Analyst

COOK COUNTY HEALTH

Year-Over-Year Contacts

Separating out CCH as a Provider of Care and as the CountyCare Health Plan



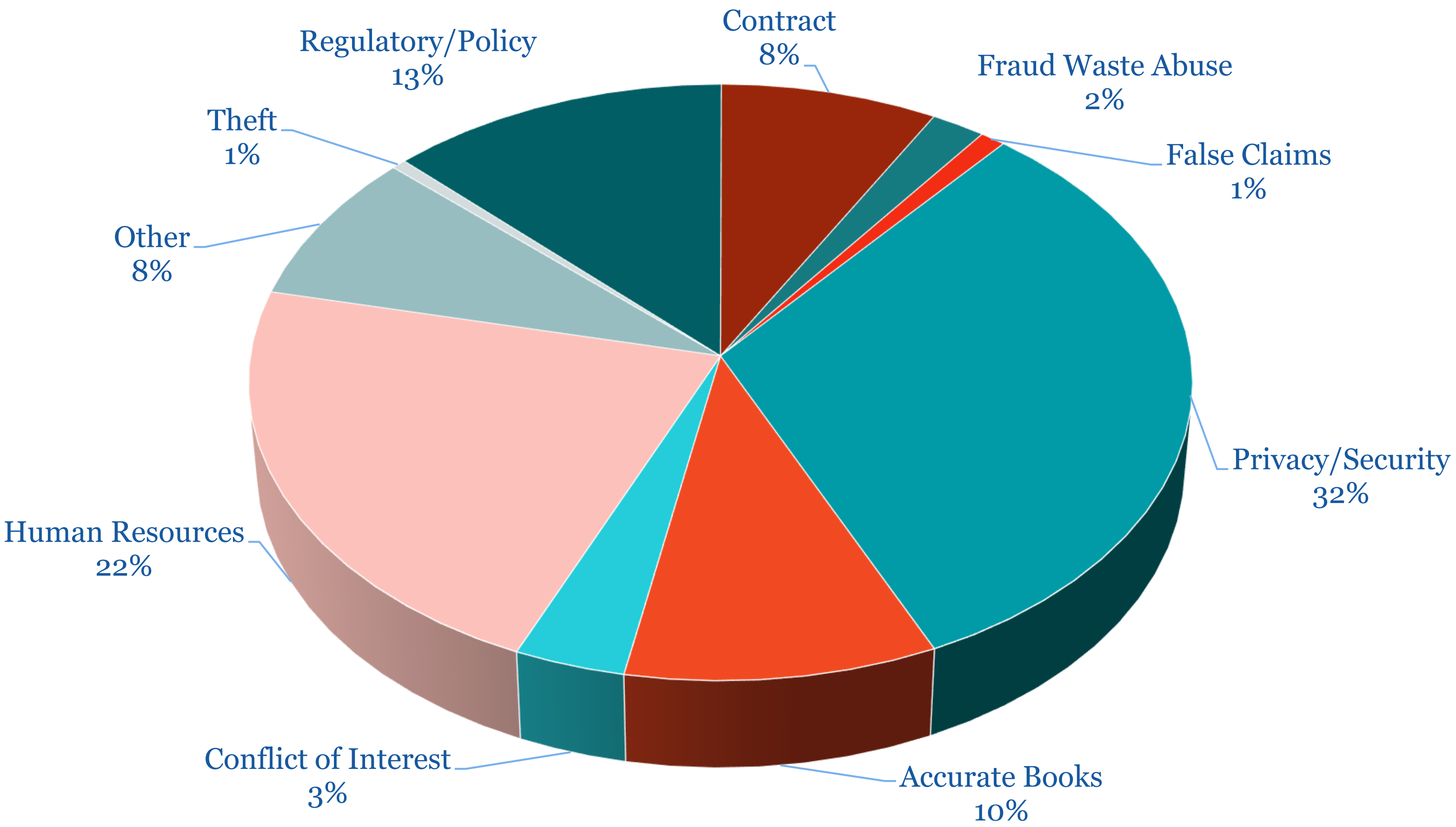
Metrics

Cook County Health as a Provider of Care

COOK COUNTY
HEALTH

2018 Contacts by Category

CCH as a Provider of Care

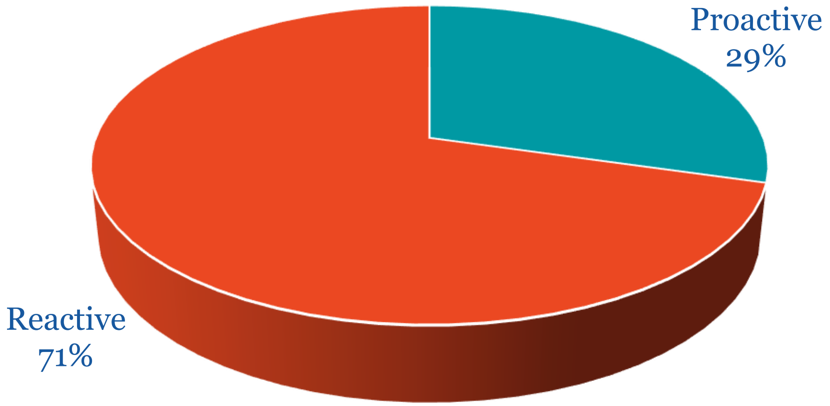


Categories	
Privacy/Security (HIPAA)	237
Human Resources	163
Regulatory/Policy	94
Accurate Books	73
Contracts	60
Conflict of Interest	26
Fraud Waste & Abuse	15
False Claims	7
Theft	4
Other	61
	740

2018 Proactive vs. Reactive Activity

CCH as a Provider of Care

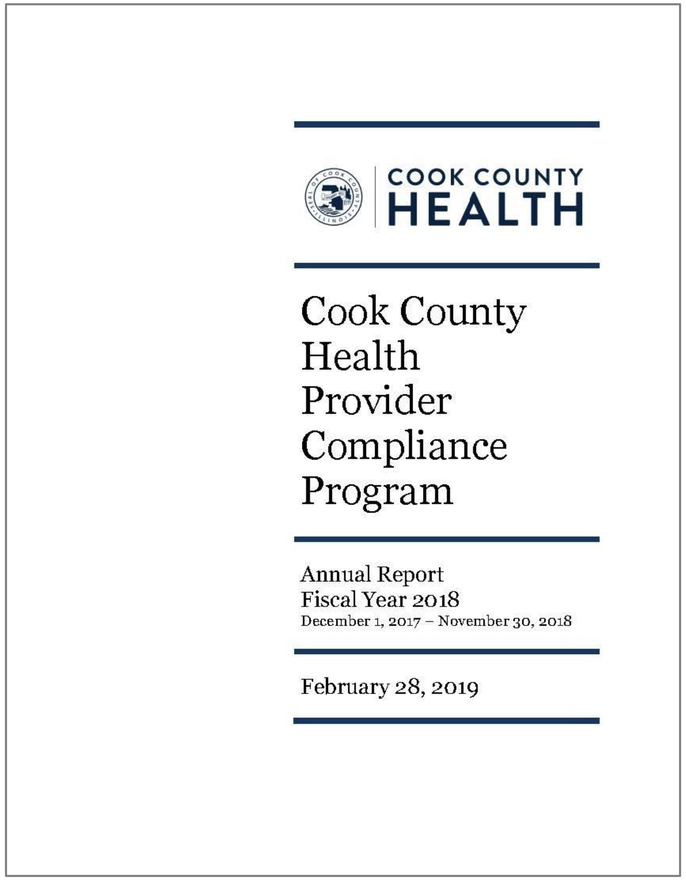
- Reactive activities are unanticipated contacts, queries, or concerns.
- Proactive activities anticipate possible issues.



While proactive activity is optimal, reactive activity is not viewed negatively by Corporate Compliance. A majority of reactive contacts indicate awareness of the Compliance Program as an organizational resource.

Annual Report

CCH as a Provider of Care



COOK COUNTY HEALTH

Cook County Health Provider Compliance Program

Annual Report
Fiscal Year 2018
December 1, 2017 – November 30, 2018

February 28, 2019

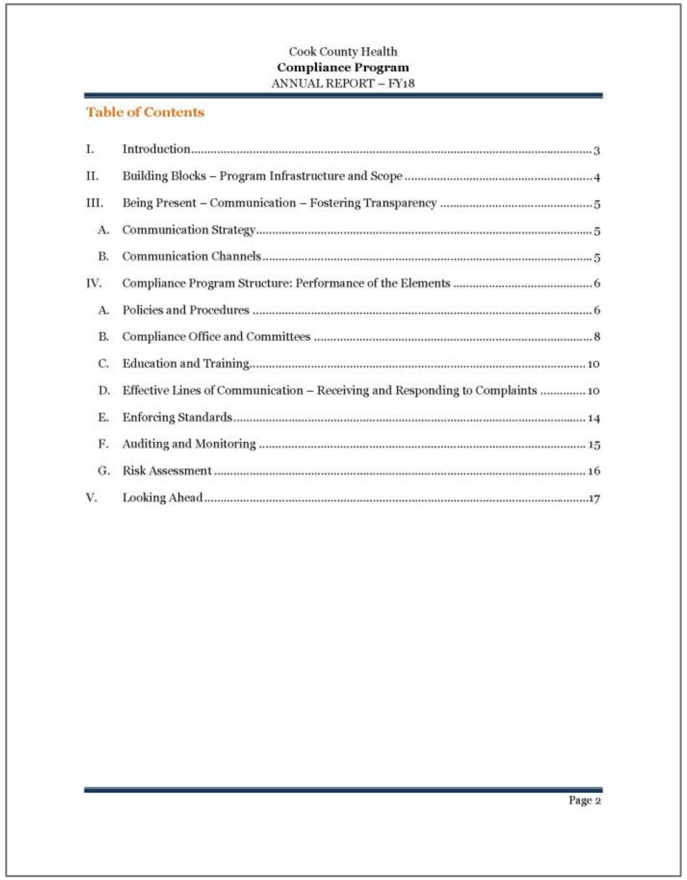


Table of Contents

I. Introduction 3
II. Building Blocks – Program Infrastructure and Scope 4
III. Being Present – Communication – Fostering Transparency 5
  A. Communication Strategy 5
  B. Communication Channels 5
IV. Compliance Program Structure: Performance of the Elements 6
  A. Policies and Procedures 6
  B. Compliance Office and Committees 8
  C. Education and Training 10
  D. Effective Lines of Communication – Receiving and Responding to Complaints 10
  E. Enforcing Standards 14
  F. Auditing and Monitoring 15
  G. Risk Assessment 16
V. Looking Ahead 17

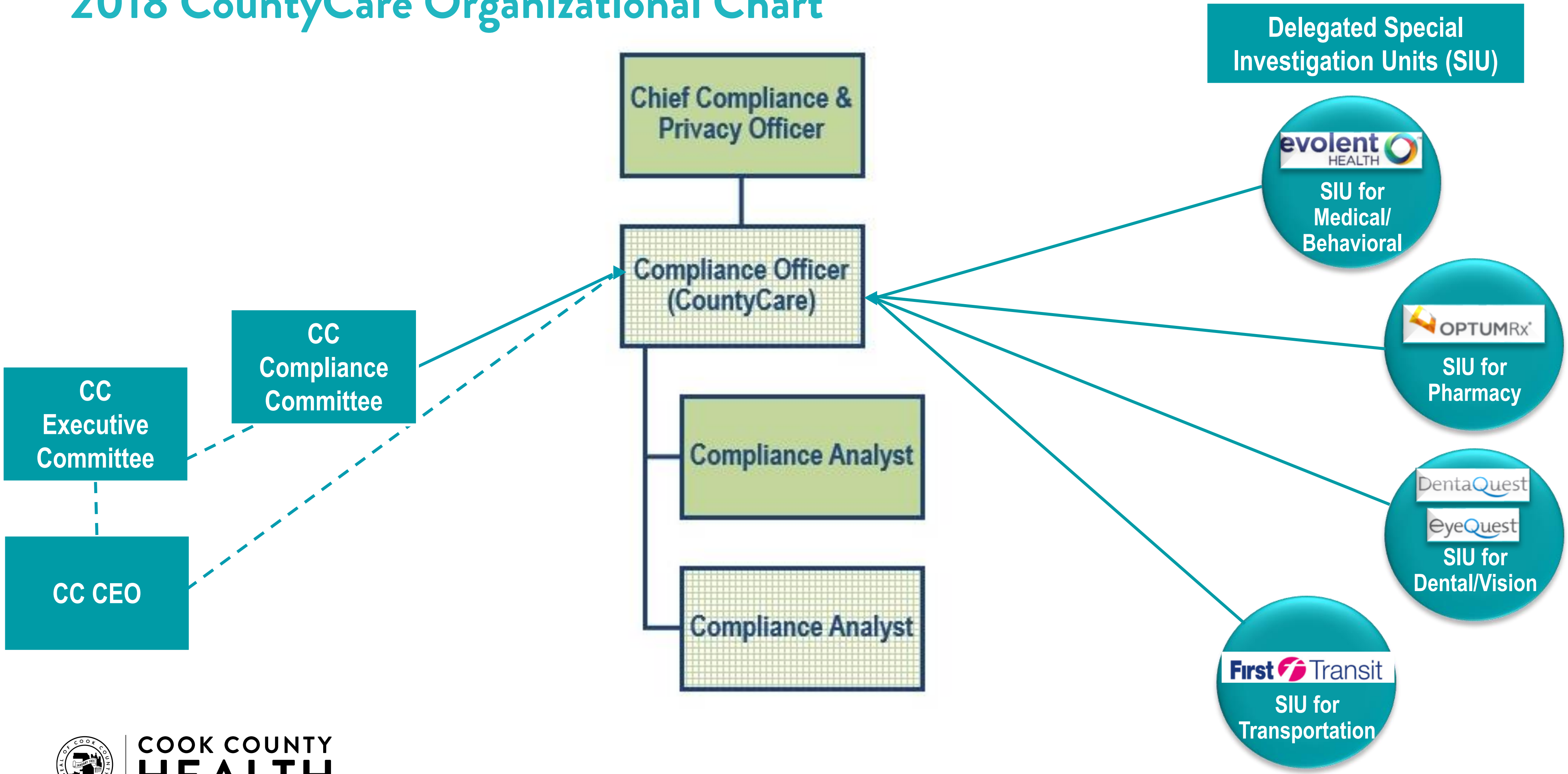
Metrics

CountyCare Health Plan

COOK COUNTY
HEALTH

CCH Corporate Compliance Staffing

2018 CountyCare Organizational Chart



Delegated Special Investigation Units (SIU)

Chief Compliance & Privacy Officer

Compliance Officer (CountyCare)

Compliance Analyst

Compliance Analyst

CC Compliance Committee

CC Executive Committee

CC CEO

evolent HEALTH

SIU for Medical/ Behavioral

OPTUMRx

SIU for Pharmacy

DentaQuest
EyeQuest

SIU for Dental/Vision

First Transit

SIU for Transportation

Fraud, Waste and Abuse Metrics

State Fiscal Year (S-FY) 2018 through S-FY19 Q1

S-FY	Reporting Quarter	Tips	Preliminary Investigations	Full Investigations	Referrals to HFS OIG	Provider Audits	Overpayments Identified *[2]	Overpayments Collected
18	Q1 07/01 -09/30/17	1	11	3	3	3	$ 97,910.84	$ 2,574.00
18	Q2 10/01 – 12/31/17	2	8	9	1	1	$ 201,038.64	$ 2,961.36
18	Q3 01/01 – 03/31/18 *[1]	70	5	15	2	103	$ 457,245.29	$ 6,097.85
18	Q4 04/01 – 06/30/18	6	5	9	2	57	$2,305.959.74	$ 28,216.99
19	Q1 07/01 -09/30/18	15	34	11	0	173	$ 694,801.54	$ 44,385.25

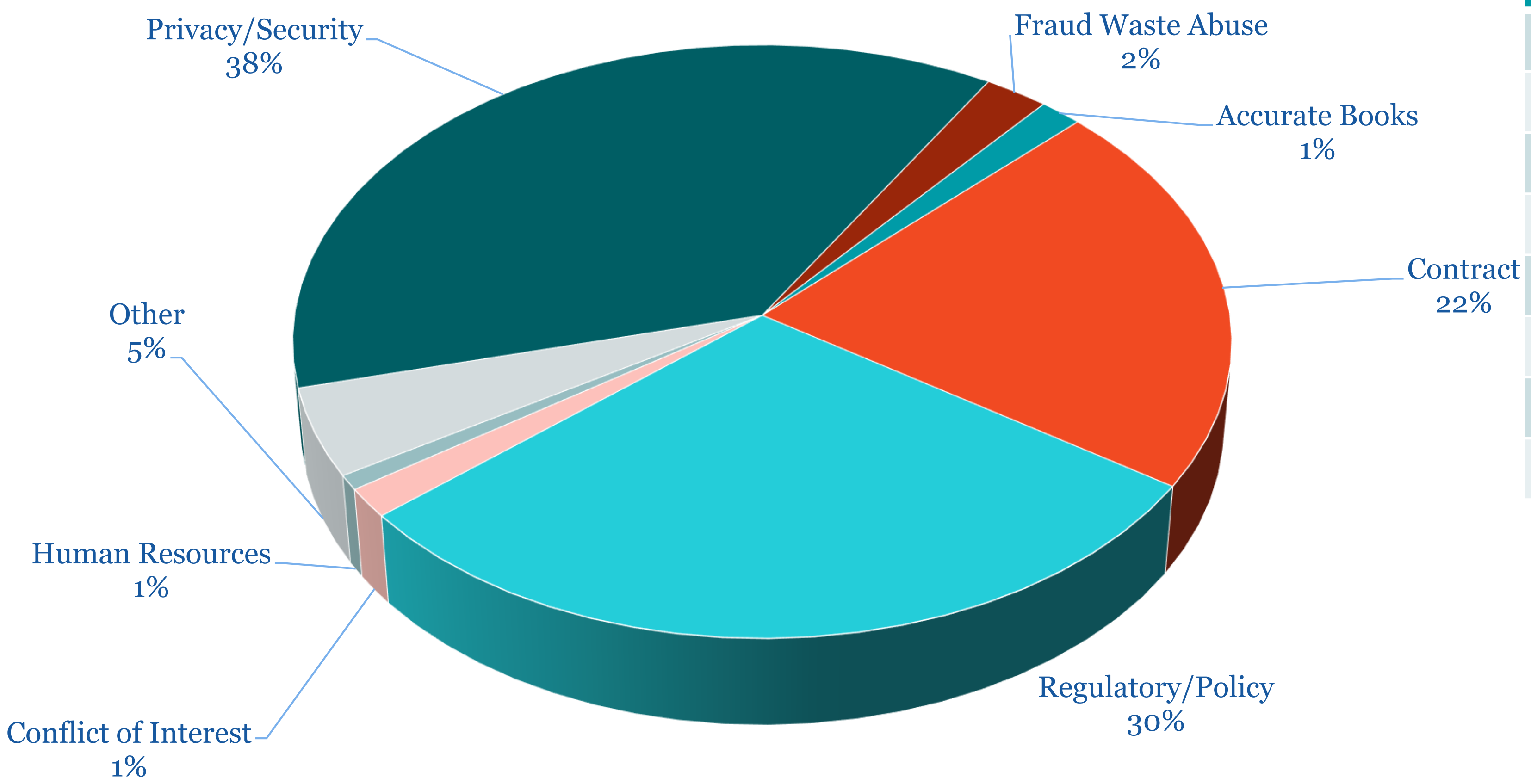
*[1] The 3rd Quarter S-FY 18 was significant for CountyCare Compliance. Evolent, CountyCare's TPA for medical and behavioral health hired two (2) local investigators dedicated solely to program integrity efforts. This dedicated team partnered with a data analytics firm to review claims for anomalies. The result of this activity is apparent in the metrics above.

*[2] The Overpayments Identified column indicates the total amount paid to the provider for the identified inaccurate codes. These amounts may be offset if a provider elects to bill a corrected claim.

> *Example: The highest level clinic visit is billed to the health plan, reimbursement is $48, the medical record is reviewed and the documentation validates a lower level. The "Overpayment Identified" is $48, however the provider may rebill a lower level and expect corresponding reimbursement of $28.35. This category does not account for the net recovery of $19.65.*

2018 Contacts by Category

CountyCare Health Plan

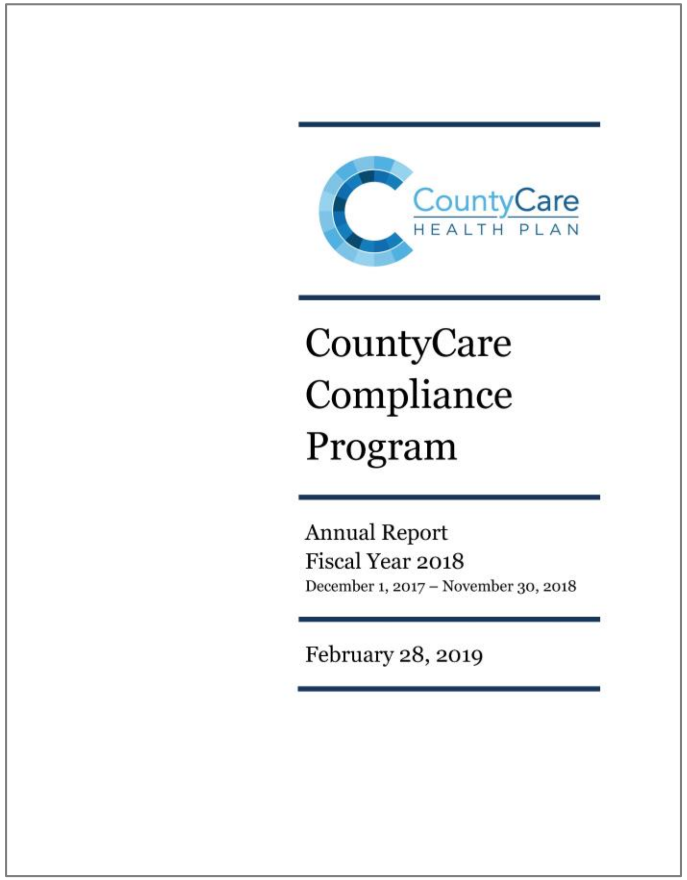


Categories	
Privacy/Security (HIPAA)	47
Regulatory/Policy	37
Contracts	27
Fraud Waste & Abuse	3
Conflict of Interest	2
Accurate Books & Records	2
Human Resources	1
Other	6
	125

COOK COUNTY HEALTH

Annual Reports

CountyCare Health Plan



CountyCare
HEALTH PLAN

CountyCare Compliance Program

Annual Report
Fiscal Year 2018
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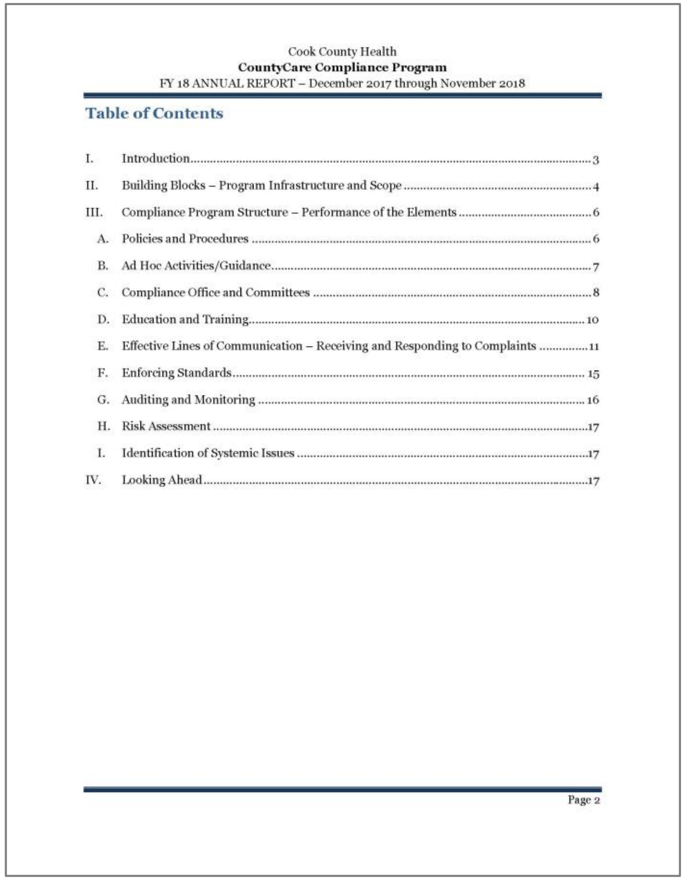


Cook County Health
CountyCare Compliance Program
FY 18 ANNUAL REPORT – December 2017 through November 2018

Table of Contents

I. Introduction......3
II. Building Blocks – Program Infrastructure and Scope......4
III. Compliance Program Structure – Performance of the Elements......6
  A. Policies and Procedures......6
  B. Ad Hoc Activities/Guidance......7
  C. Compliance Office and Committees......8
  D. Education and Training......10
  E. Effective Lines of Communication – Receiving and Responding to Complaints......11
  F. Enforcing Standards......15
  G. Auditing and Monitoring......16
  H. Risk Assessment......17
  I. Identification of Systemic Issues......17
IV. Looking Ahead......17

Annual Education

COOK COUNTY HEALTH

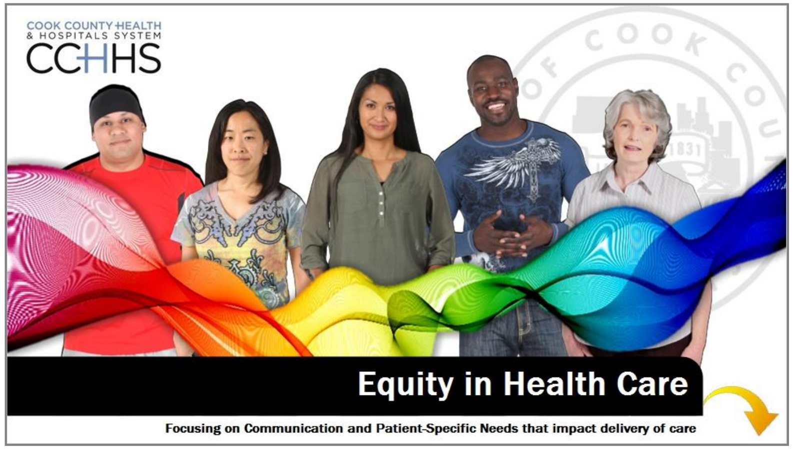
Annual Requirement

COOK COUNTY HEALTH & HOSPITALS SYSTEM
CCHHS

Code of Ethics

A standard of conduct for all CCHHS workforce members

Click **NEXT** to begin



COOK COUNTY HEALTH & HOSPITALS SYSTEM
CCHHS

Equity in Health Care

Focusing on Communication and Patient-Specific Needs that impact delivery of care

COOK COUNTY HEALTH & HOSPITALS SYSTEM
CCHHS

Fraud

Waste

and

Abuse

Click NEXT to continue

CCHHS
Cook County Health & Hospitals System

Advancing Cultural Competency

Unconscious Bias

Click **NEXT** to begin.

Questions?

COOK COUNTY
HEALTH